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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff,

Plaintiff,

v.

ESTATE OF JAMES M. GOODMAN, and AUDREY
GOODMAN, individually, and in her capacity as
Personal Representative of the Estate of James M.
Goodman,

Defendants.

Hearing Date: September 20, 2023

Hearing Time: 10:00 a.m. (EST)

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05079 (CGM)

NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Statement of Material Facts in Support of the Trustee’s Motion for Summary Judgment, the Declarations of Nicholas J. Cremona, Bruce G. Dubinsky, Lisa M. Collura, and Matthew B. Greenblatt in Support of Trustee’s Motion for Summary Judgment, with all exhibits annexed thereto, and upon all the prior pleadings and proceedings herein, Irving H. Picard, as trustee (“Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–*III*, and the substantively consolidated chapter 7 estate of Bernard L. Madoff, by and through his counsel, moves this Court, before the Honorable Cecelia G. Morris, United States Bankruptcy Judge for the Southern District of New York, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004-1408, on **September 20, 2023 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, for an order granting the Trustee’s motion for summary judgment (“Motion”) on Count One of the Trustee’s Complaint pursuant to Rule 7056 of the Federal Rules of Bankruptcy Procedure and Rule 56 of the Federal Rules of Civil Procedure, together with such other relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE pursuant to the Court’s directive, all hearings will be conducted remotely pending further Order of the Court. All parties who wish to participate in the Hearing must refer to Judge Morris’ guidelines for remote appearances and are required to make arrangements to appear via ZoomGov. For further details on ZoomGov, please call the Courtroom Deputy at (845) 451-6367. Further instructions regarding remote appearances via ZoomGov can be found on the Court’s website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>. Pro se parties may participate telephonically in hearings free of charge.

PLEASE TAKE FURTHER NOTICE that Defendants' opposition to the Trustee's motion shall be served and filed on or before September 13, 2023 and the Trustee's reply papers shall be served and filed on or before September 15, 2023. Hearing on the Trustee's motion shall take place at **10:00 a.m. on September 20, 2023.**

Dated: August 22, 2023
New York, New York

/s/ Nicholas J. Cremona
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Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*